

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

PARAGON COMPONENT SYSTEMS, LLC,)	
)	
Plaintiff,)	CIVIL ACTION NO.:
)	1:24-CV-00246-CEA-CHS
v.)	
QUALTIM, INC., et al.,)	DECLARATION OF SUZANNE
)	GRUNDAHL IN SUPPORT OF
Defendants.)	SUZANNE GRUNDAHL AND
)	INSPIRED PURSUITS, LLC

I, Suzanne Grundahl, being duly sworn, hereby affirm as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. I have personal knowledge of the matters testified to herein.
2. I am a resident of Wisconsin and reside at 1130 Fairway Court, Lake Mills, Wisconsin, 53551. I have maintained that residence since 2018 and lived in Wisconsin for 52 out of 56 years.
3. I have never been contracted to travel to Tennessee to perform any engineering, manufacturing, financial, or information technology work for Paragon Component Systems, LLC, or for any other entity or individual.
4. I have never marketed or advertised in Tennessee.
5. I have never had an office in Tennessee.
6. I have never maintained any bank account in Tennessee.
7. I am a manager-member of Inspired Pursuits, LLC (“IP-LLC”)
8. IP-LLC is a limited liability company organized in Texas in 2017. It was later re-organized, registered, and domiciled in Wisconsin in 2022.
9. None of IP-LLC’s members reside in Tennessee.

10. The current IP-LLC managers, Kirk Grundahl and myself, all reside in Wisconsin.

11. IP-LLC has never marketed or advertised in Tennessee.

12. IP-LLC has never had an office in Tennessee.

13. IP-LLC has never maintained any bank accounts in Tennessee.

14. IP-LLC has no clients in Tennessee.

15. IP-LLC has no employees, therefore it has no employees who have traveled to Tennessee.

16. I have known Daniel Holland (“Dan”) since 1999 through my work at Qualtim, Inc., where I am Vice-President.

17. Through the years, I have witnessed Dan and Kirk collaborate on many ideas to improve the structural building component and structural framing industry.

18. Dan and I worked together to create the name “Inspired Pursuits, IP-LLC.” We settled on this name because it embodied the “pursuits” inspired by Kirk, Dan and me; we used the acronym “IP” that generally connotes intellectual property in daily conversation and was our shared passion to use our knowledge to create innovation in our industry.

19. Our partnership began in earnest in 2009, where we began the development of engineering software that would be utilized by Kirk’s companies, Qualtim and later DrJ, to sign and seal structural building components manufactured by Dan’s company, CCI. I was responsible for invoicing related to CCI and Qualtim/DrJ, respectively. Starting in 2009 our early thinking, given the 50/50 partnership, was to memorialize this by discounting our invoices by 50%, where a note was included on the invoice stating “Qualtim’s Share” because we understood our work to develop industry innovations through our trade secret knowledge was a 50/50 intellectual property development partnership. CCI paid Qualtim its 50% portion of these invoices.

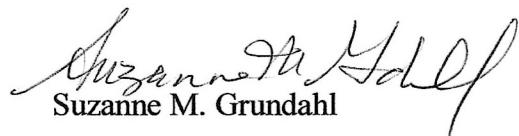
20. Dan visited Wisconsin to meet with Kirk and me more than 10 times since 1999. We attended industry events together and had endless discussions about our innovative ideas and our vision in how we can keep moving forward on them. I participated in physical meetings in Wisconsin with John Holland, Dan Holland and/or Paragon staff that include, but may not be limited to the following dates: May 13-14, 2015, January 4-5, 2017 September 13-14, 2017, May 29-30, 2018, July 12-13, 2023 (a face-to-face strategic planning meeting on July 12 and a visit to Wausau Homes in Wausau WI on July 13), and the Paragon-DrJ Summit meeting held August 7-11, 2023.

21. I have never been contracted to travel to Tennessee to perform any engineering, manufacturing, financial, or information technology work for Paragon.

22. I have no employees who have been contracted to travel to Tennessee to perform any work for Paragon.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 26, 2024.



Suzanne M. Grundahl